



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029**

October 25, 2010

Mr. Jeffrey D. Williams
Senior Environmental Engineer
National Security Agency
Central Security Service
Fort George G. Mead, Maryland 20755-6000

Re: Final Environmental Impact Statement Addressing Campus Development at Fort George G. Meade, Maryland (CEQ 20100385)

Dear Mr. Williams:

In accordance with the National Environmental Policy Act (NEPA) of 1969, Section 309 of the Clean Air Act and the Council on Environmental Quality regulations implementing NEPA (40 CFR 1500-1509), the U.S. Environmental Protection Agency (EPA) has reviewed the Final Environmental Impact Statement (FEIS) for the Campus Development at Fort George G. Meade in Maryland. While the FEIS addressed most of EPA's comments on the Draft Environmental Impact Statement (DEIS), EPA would like to comment on two of the responses to EPA's comments on the DEIS as presented in its letter of August 16, 2010.

Response EPA-4 in reference to comment on Biological Resources/Vegetation: EPA suggested that conservation of the forested area be factored into the planning/design phase of development. It was also suggested that an analysis of forest fragmentation associated with each alternative be evaluated. The Department of Defense/National Security Authority (DOD/NSA) response states that "...several measures would be incorporated into the design plan to minimize or avoid fragmentation and adverse impacts on species with large home ranges. These measures include preservation of large or historic trees (where feasible) and additional trees planted around them." EPA appreciates DOD/NSA efforts.

However, text was added to Section 4.7.3 under the Proposed Action (Phase I) which states that "...the installation would preserve 20 percent of the project area as forest. If this is not possible, then alternative sites would be designated for reforestation. Reforestation strategies would include a range of landscape improvements such as onsite street trees, site landscape plantings, and open space plantings in conjunction with other storm water management approaches that could include wetland conservation and enhancement practices." It is important to note that reforestation strategies should be separate and distinct from wetland initiatives. Wetland conservation and enhancement practices should not be used to account for reforestation efforts.

Response EPA-10 in reference to Soil/Groundwater: EPA asked the following three questions: 1) why remedial action was not required on Site M when it was stated that pesticides were in excess of MDE soil cleanup standards at several sampling locations; 2) why the sampling investigation did not test for arsenic and lead knowing that they were commonly used as pesticides in the past; and 3) why there was no groundwater sampling considering the type of contaminants discussed.

DOD/NSA responded that the soil sampling investigations found levels of pesticide contamination in excess of Maryland Department of the Environment (MDE) residential soil clean-up standards. Because Site M is proposed for future use as an administration complex, no remedial action was determined to be required. Quantitative data should have been provided to distinguish the levels of clean-up for residential versus administration use.

In addition, the FEIS did not explain why Site M was not tested for arsenic and lead nor did it state why groundwater or soil and lead sampling were not conducted. Although the Environmental Baseline Survey did not indicate reasons or answers to these questions, an explanation pursued by DOD/NSA would have provided understanding and credibility.

Thank you for providing EPA with the opportunity to review this project. If you have questions regarding these comments, the staff contact for this project is Karen DelGrosso; she can be reached at 215-814-2765.

Sincerely,



Barbara Rudnick
NEPA Team Leader
Office of Environmental Programs

